

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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THE ABI JAOUDI AND AZAR TRADING CORP., :  
Plaintiff, : Civil Action No. 91-6785  
: :  
-against- :  
CIGNA WORLDWIDE INS. CO. :  
Defendant. :  
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**DEFENDANT'S MOTION FOR RELIEF REGARDING  
RESPONDENT SAMUEL M. LOHMAN'S FAILURE  
TO COMPLY WITH THE COURT'S AUGUST 19, 2011 ORDER**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law in support of this motion and its annexed exhibits, the pleadings and all other papers heretofore filed in this action, and pursuant to the Court's Order of September 14, 2011, Defendant CIGNA Worldwide Insurance Company ("CWW") respectfully moves this Court for an Order, substantially in the form attached hereto, pursuant to Rules 37(a) and 45(d) of the Federal Rules of Civil Procedure:

(i) Compelling Mark Gottlieb, Esquire, and Henry Reichner, Esquire, each to produce to the Court for *in camera* review all of the documents identified on the privilege logs produced by Respondent Samuel Lohman on June 6, 2011; and

(ii) Compelling Respondent Samuel M. Lohman to appear in the Eastern District of Pennsylvania, to have his deposition taken, under the supervision of the Court, pursuant to the discovery notice previously served by CWW.

Respectfully submitted,

Dated: September 28, 2011  
New York, New York

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